

SINGH LAW FIRM, P.A.

132 E. 43rd Street Suite 618 New York, NY 10017

Jaitegh Singh (FL, NJ, NY, & CO) Direct Phone: (212) 687-2578 jt@jtsinghlaw.com

November 22, 2019

VIA ECF:

Honorable Michael A. Hammer United States Magistrate Judge United States District Court for the District of New Jersey 50 Walnut Street #4015 Newark, NJ 07101

Re: Echegoyen v. U.S. Standard Holdings Trust LLC, et al.

Case No. 2:15-cv-06382 (KM)(MAH)

Dear Judge Hammer:

This letter is being sent pursuant to your order for further assurances regarding representations of Defendants in the above-mentioned case. I am following up on my previous correspondence sent on November 4, 2019.

Unfortunately, I have still been unable to obtain further assurances as we do not have the cooperation of Mr. Munier. At this time, the client is currently seeking to substitute counsel.

If your honor wishes to proceed with a formal hearing in which Defendants are required to attend, I respectfully request to schedule the hearing after December 26, 2019. As I will be away on a religious sabbatical and will only be available remotely and not physically present before December 26, 2019.

Furthermore, Plaintiff's Counsel and Defendant's Counsel is requesting a two-week extension in order to provide the joint letter regarding the tax return matters.

Thank you for your continued patience on this matter.

Sincerely,

Jaitezh Sinzh

Jaitegh Singh, Esq.

Partner at Singh Law Firm, P.A.